



**ORANGE COUNTY PUBLIC SCHOOLS**  
**Taylor Education Administration Complex**  
**200 Dailey Drive**  
**Orange, VA 22960**  
**www.ocss-va.org**  
**540-661-4550                      540-661-4599 Fax**

April 26, 2012

Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

In the Matter of	)	
	)	
Lifeline and Link Up Reform and	)	WC Docket No. 11-42
Modernization	)	
	)	
Lifeline and Link Up	)	WC Docket No. 03-109
	)	
Federal-State Joint Board on Universal	)	CC Docket No. 96-45
Service	)	
	)	WC Docket No. 12-23
Advancing Broadband Availability Through	)	
Digital Literacy Training	)	

Dear Sir/Madame:

I am writing today in response to the FCC's Notice of Proposed Rulemaking which, among other things, proposes a Digital Literacy Pilot to fund schools and libraries operating digital literacy training courses. Before delving into my response to the proposed pilot, I want to first thank the FCC for your continued support for the E-Rate program. The E-Rate program provides critical discounts to assist schools (like mine) to obtain affordable telecommunications and internet access.

E-Rate discounts and reimbursements are very critical to Orange County Public Schools. Orange is a small, rural school division in Central Virginia with 5,020 students, about 38% of whom qualify for free and reduced price lunches.

To my great surprise, our school division failed to pursue E-Rate reimbursements until my arrival in 2009. Upon the initiative of a new director of technology, we implemented a tracking process in 2010 and we received our first \$50,000 in reimbursements during 2011. The funds supported expansion of network servers at both the division and school levels. We also used the funds to support essential staff development. Allocating the 2011 E-Rate funds for network expansion was a luxury since we have been able to rely on ample supplemental funds for computer replacement during the past three years. In the coming year, however, our full E-Rate reimbursement stream will be needed for more fundamental needs, such as maintaining our

teacher computer replacement cycle. In recent years, teacher and student replacement cycles have become increasingly dependent on revenues from the American Recovery and Reinvest Act (ARRA), school improvement funds under the Elementary and Secondary Education Act (ESEA), one-time only construction bond funds, and periodic year-end surplus funds. ARRA, ESEA and construction funds will not be available in FY 2013. Consequently, we will rely much more heavily on E-Rate funds for basic computer replacement.

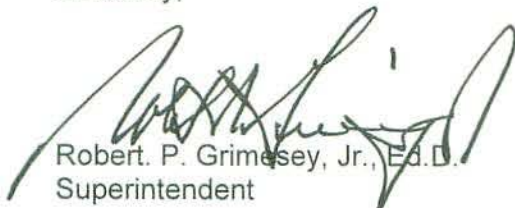
The pilot would provide grants to K-12 schools and libraries, lasting four years, to hire trainers, conduct training courses and provide resources/materials to those who lack digital literacy skills. While the FCC does not propose to fund the pilot using E-Rate funds, it does propose implementing and administering the program through the same division that oversees the E-Rate program. Specifically, the FCC proposes implementing/administering the program through the Schools & Libraries Division of the Universal Service Administrative Company (USAC).

The Orange County School Board is concerned that operating the pilot through E-Rate will undermine the important and ongoing work of E-Rate, causing delays in the program's application and appeal processes, creating auditing problems and results in problematic precedents for E-Rate's eligible services. **Specifically, we oppose the proposal to operate/administer the proposed pilot through the E-Rate program.**

Any decrease in the discounts or reimbursements we receive from E-Rate will have a negative impact on our capacity to ensure that our teachers and students have access to 21<sup>st</sup> century technology. It is clear that E-Rate is oversubscribed and underfunded already. To divert resources (whether fiscal or administrative) away from the program before it fulfills its stated goals is premature/shortsighted.

Thank you for considering our response as you move forward with your decision on the Digital Literacy Pilot. We applaud the FCC for its continued efforts to protect the already oversubscribed E-Rate program by not funding the pilot with E-Rate funding. We urge you to take similar protective measures when it comes to the implementation and administration of the pilot. Please ensure that critical, limited E-Rate resources—both fiscal and administrative—are protected.

Sincerely,



Robert P. Grimesey, Jr., Ed.D.  
Superintendent

Cc: Orange County School Board Members